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April 20, 2005

Via First Class Mail

Kathleen J. Hill, Esq.
Law Office of Kathleen J. Hill
92 State Street, Suite 700
Boston, MA 02109

Re: Griffith v. OneBeacon Insurance Company, et. al
U.S.D.C. Massachusetts, Docket No. 03-CV-12573-EFH

Dear Kathleen:

Plaintiff's Response to Defendants' Second Set of Interrogatories served February 28, 2005 via hand delivery is currently three weeks overdue. Defendants' require Plaintiff's Response in order to complete the deposition of Bernadine Griffith.

Please contact me as soon as possible if you are unable to serve Defendants via hand delivery with Plaintiff's Response on or before April 25, 2005. Should Plaintiff be unable to respond before April 25, 2005, Defendants will request that Ms. Griffith's deposition be rescheduled to take place during the week of May 16, 2005.

Additionally, Defendants are in the process of compiling the information necessary to respond to the discovery requests which were the subject of Plaintiff's February 28, 2005 Motion to Compel granted by the Court on March 15, 2005. Much of the information requested is archived and relates to offices that are no longer in existence. As such, retrieval of this information must be by hand. Please be advised that Defendants are making every effort to comply with the Court's Order.

Please feel free to contact me with questions or concerns.

Very truly yours,


Leah M. Moore

cc: Joan K. Geddes, Esq. (via first class mail)
Keith B. Muntyan, Esq.